EPA REGISTRATION FILE JACKET

REGISTRATION # 264-1035 Volume 2

264-1035

308





U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number: Date of Issuance:

264-1035

SEP 1 1 2008

Terms of Issuance: Conditional

Name of Pesticide Product:
PROSPER T200
Insecticide and
Fungicide Seed
Treatment

NOTICE OF PESTICIDE:
_____ Registration
_____ Reregistration
____ (under FIFRA, as amended)

Name and Address of Registrant (include ZIP Cods): Bayer CropScience LP

Dayer Cropscience L

P.O. Box 12014

2 T.W. Alexander Dr.

Research Triangle Park, NC 27709

Notes Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce: In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

Based on your response to the Reregistration Eligibility Document(s) for Carboxin, EPA has reregistered the product listed above provided that the following changes are made to the label:

 On page 2, change "Do not contaminate water, food, or feed by storage, disposal, or cleaning of equipment." to "Do not contaminate water, food, or feed by storage and disposal."

Signature of Approving Official:

Mary L. Waller

Mary Waller

Product Manager (Team 21)

Fungicide Branch

Registration Division

Date:

SEP 1 1 2008

MPA Porm 8570-6

Page 2 Notice of Reregistration (continued) EPA Reg. No. 264-1035

2. On page 2, under the Environmental Hazard heading, delete current statement and add "Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

This product contains metalaxyl that is known to leach through soil into groundwater under certain condition as result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds."

- 3. On page 2, in the Labeling of Treated Seed section, add "This product contains metalaxyl that is known to leach through soil into groundwater under certain condition as result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination."
- 4. Because the REI for Metalaxyl is 24 hours, on page 2, change "do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours" to "do not enter or allow worker entry into the treated areas during the restricted-entry interval (REI) of 24 hours."
- 5. On page 4, after the Conditions heading, revise "All such risks shall be assumed by the user or buyer." by adding "To the extent consistent with applicable law, all such risks..."

This action is taken under the authority of section 4(g)(2)(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Submit one (1) copy of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supersede all previously accepted labels. A copy of your label stamped "Accepted with Comments" is enclosed for your records. If you have questions concerning this letter, you may contact me at 703-308-9354.

Sincerely,

Mary Waller

Product Manager (Team 21)

Mary L. Waller

Fungicide Branch

Registration Division (7505P)

Enclosure

PROSPER® T200 Insecticide and Fungicide Seed Treatment

PROSPER T200 contains the following amount of active ingredient per gallon:		
1.19 lb. clothianidin; 0.06 lb. trifloxystrobin; 0.42 lb. carboxin; 0.045 lb. metalaxy	l.	
ACTIVE INGREDIENTS:		
Clothianidin: [(C(E)]-N-(2-chloro-5-thiazolyl)methyl]-N'-methyl-N"-nitroguanidine	************	 11.05%
Trifloxystrobin		 0.552%
Carboxin: 5,6-dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide		 3.87%
Metalaxyl: N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester		 , 0.414%
OTHER INGREDIENTS:		
		100.00%
EPA Reg. No. 264-1035	FPA Est.	

KEEP OUT OF REACH OF CHILDREN CAUTION

For <u>MEOICAL</u> And <u>TRANSPORTATION</u> Emergencies <u>ONLY</u> Call 24 Hours A 0ay 1-800-334-7577 For <u>PROOUCT USE</u> Information Call 1-866-99BAYER (1-866-992-2937)

FIRST AID

	FIRST AID
IF IN EYES:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes.
,	 Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	Call a poison control center or doctor for treatment advice.
	In case of emergency call toll free the Bayer CropScience Emergency Response Telephone No. 1-800-334-7577. Have a product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, neoprene rubber. If you want more options, follow the instructions for category C and E on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, and other handlers must wear:

- Hong sleeved shirt and long pants,
- -socks plus shoes,
- -chemical resistant gloves, except when bagging or sewing bags of treated seeds,
- -chemical resistant aprons when mixing, loading, or participating in dip treatments.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and not water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENGINEERING CONTROLS

When handlers use closed systems designed by the manufacturer to enclose the pesticide to prevent it from contacting handlers or other people and the system is functioning properly and is used and maintained in accordance with the manufacturer's written operating instructions, the handlers need not wear the chemical-resistant apron. However, the chemical-resistant gloves must be immediately available for use in an emergency, such as a spill or equipment breakdown.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate by disposal of wastes. Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.

Endangered Species

This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult http://www.epa.gov/espp before each season's use of this product.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial treaters only. Not for use on agricultural establishments in hopper-box, slurry-box, or other seed treatment applications at, or immediately before, planting. Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal, or by cleaning of equipment.

PESTICIDE STORAGE

Storage at low temperatures is not recommended. Do not store above 95°F. Do not store in direct sunlight. PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Contact Bayer CropScience or your chemical supplier for container return instructions. If container is not returned in accordance with instructions, triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LABELING OF TREATED SEED

Seed that has been treated with this product that is then packaged or bagged for future use must contain the following labeling on the outside of the seed package or bag:

- This seed has been treated with clothianidin, trifloxystrobin, carboxin, and metalaxyl.
- Dispose of seed packaging in accordance with local requirements.
- This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species with out authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult https://www.epa.gov/espp before each season's use of this product.
- Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.
- When opening this bag or loading/pouring the treated seed, wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves.
- Treated Seed- Do Not Use for Food, Feed, or Oil Purposes.
- After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of t2 hours. Exception: Once the seeds are planted in soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no worker contact with the soil/media subsurface.
- Rapeseed greens and seed grown or harvested from PROSPER T200-treated seed must not be used for feed or human
 consumption. Rapeseed grown and harvested from PROSPER T200-treated seed is only for industrial uses and cannot be
 used for edible oil or any other human/feed consumption.

5

Areas planted with treated seed may be replanted immediately with canola, rapeseed and corn. These areas may also be
replanted after 30 days with cereal grains, grasses, non-grass animal feeds, soybeans, and dried beans. Do not plant any
other crop in the treated area for at least four months after treated seeds are planted.

GENERAL INFORMATION

PROSPER T200 is a systemic insecticide and fungicide seed treatment for use on canola and rapeseed for control of certain insect pests and for control of seed rot, damping off, seedling blight and early season root rot caused by *Pythium*, *Rhizoctonia*, *Fusarium* and *Atternaria*. Also controls seedborne Blackleg. For protection of seeds and emerging seedlings only.

For use in commercially available equipment designed for seed treatment only. Not for use in hopper-box, slurry-box, or similar seed treatment applications used at planting. This product is to be used in liquid or slurry treaters. Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

All seed treated with this product must be conspicuously colored at the time of treatment. If this product contains no colorant, an appropriate colorant must be added to distinguish seed and to prevent subsequent inadvertent use as a food for man or a feed for animals. Regulations pertaining to coloration of treated seed enforced by 40 CFR 153.155 must be strictly adhered to when using this product.

DIRECTIONS FOR USE

Prior to and during application, PROSPER T200 must be thoroughly agitated to ensure uniform mixing.

Canola and Rapeseed: Apply 21.5 fl. oz. of PROSPER T200 to 100 lbs. of seed using commercial seed treatment equipment.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Bayer CropScience, no claims are made to guarantee germination of carry-over seed.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

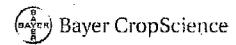
NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

NET CONTENTS:

PROSPER is a registered trademark of Bayer

PRODUCED FOR



Bayer CropScience LP P.O. Box 12014, 2 T.W. Alexander Drive Research Triangle Park, North Carolina 27709 1-866-99BAYER (1-866-992-2937)

PROSPER T200 (PENDING) SUBMITTED TO EPA 09/24/07

DATA PACKAGE BEAN SHEET

Date: 12-Dec-2007 Page 1 of 3 Decision #: 373921

DP #: (347454)

PRIA

Parent DP#:

* * * Registration Information * * *

Registration:	264-1035 - PROSPER T20	00 INSECTICIDE	AND FUNGIO	CIDE SEED TREAT					
Company:	264 - BAYER CROPSCIENCE LI	P							
Risk Manager:	RM 01 - Venus Eagle - (703) 308-8045 Room# PY t S-7228								
Risk Manager Reviewer;	Barbara Briscoe BBRISCOE								
Sent Date:			Edited Due Date:						
	Product Registration - Section 3	-	, ,						
Action Desc:	<u> </u>								
	See page 3								
	* * * Data	Package Info	ormation *	**					
Expedite:	◯ Yes ● No	Date Sent:	12-Dec-2007	Due Back:					
DP Ingredient:	See page 3								
	,	-		-					
DP Title:	RD Label review for reregistration	n of carboxin							
CSF Included:	Yes No Label In	ncluded: Yes	No Pare	nt DP #:					
Assigned T	<u>o'</u>	Date In	Date Out						
Organization: RD / I	RB			Last Possible Science Due Date:					
Team Name: RM 0	<u> </u>			Science Due Date:					
	_ 			Sub Data Package Due Date:					
		es Sent for Re	view * * *						
		No Studies							

* * * Additional Data Package for this Decision * * *

Printed on Page 2

* * * Data Package Instructions * * *

Attn RM t, Venus Eagle

This product is recommended for amended reregistration (this product contains multiple actives) pending your review of label for compliance with the Carboxin RED, technical reviews and Agency label policies. Upon your review, close out with the appropriate reregistration code.



Page 2

DP#: (347454) *** Additio. Date Peckage for this Decision ***

DP#: Date Sent Date Due: Visituations? Ses

Date Sent Date Due Vistructions? SEF label 345964 SRRD / PRB 26-Oct-2007 PRB 26-Oct-2007 Yes No No Yes No Yes No No Yes No Yes No Yes No Yes No Yes No Yes No No Yes No Yes No No Yes No No Yes No No Yes No Yes No Yes No Yes No Yes No No Yes No No Yes Yes No Yes

) Declalon#: (373921) Page 3

DP#: (347454) *** Produc__.nd Data Package Ingredients ***

Decision#: (373921)

PC Code	AS CAS	pgredient Name
044309	210880-92-5	Clothianidin
090201	5234-68-4	Carboxin
113501	57837-19-1	Metalaxyl
129112	141517-21-7	Trifloxystrobin
113501	57837-19-1	Metalaxyi(.414%)
090201	5234-68-4	Carboxin(3.87%)
129112	141517-21-7	Trifloxystrobin(.552%)
044309	210880-92-5	Clothianidin(11.05%)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

December 5, 2007

MEMORANDUM:

Subject:

Carboxin RED

Prosper® T200

EPA Reg. No.: 264-1035

Re: PRB Preliminary Label Assessment

From:

Judy Loranger Quely honor 12/12/07

Product Reregistration Branch

Janan Solot 12/12/07

Special Review and Reregistration Division (7508P)

Through:

Lawrence Schnaubelt

Product Reregistration Branch

Special Review and Reregistration Division (7508P)

To:

Venus Eagle, Product Manager, Risk Management Team 1

Insecticide-Rodenticide Branch Registration Division (7505P)

SCOPE: The primary purpose of this preliminary label assessment is to determine whether or not the draft labels submitted in connection with product reregistration comply with amended labeling language specified in Chapter V of the subject RED/IRED. Product-specific data (product chemistry, acute toxicity, and in some cases efficacy data) were also required to be submitted or cited to support product reregistration. PRB's reviews of these data are appended to this assessment and may require additional revisions to the product label.

BACKGROUND: The registrant has submitted 5 copies of draft labeling for the subject product in its 8-month response to the RED/IRED. PRB has completed a preliminary assessment of the draft labeling. A copy of this assessment may be accessed electronically on the LAN through the Q-Drive. The path is q:\prb\label\000264/1035.

Note: In addition to the information presented in this preliminary label assessment, Product Manager/Label Reviewers must apply their own knowledge of the subject product and the product's regulatory history (including comparison with existing stamped accepted labeling) to conduct a final review of the proposed label. It is the responsibility of the PM to obtain the necessary label improvements required for final product reregistration.

This product contains multiple active ingredients. PRB has not conducted an in-depth assessment of the label to determine if label requirements for the Metalaxyl RED have been addressed by the registrant. Where differences in PPE and WPS requirements exist, PRB has attempted to adopt the more restrictive language.

PRB recommends that the PMs continue to follow the guidance provided in the Label Review Manual, including formatting suggestions presented in the sample labels in Chapter 3, to improve the quality and consistency of product labels.

RECOMMENDATIONS:

The label contains text as required in the Carboxin RED. However, the subject product requires revisions to conform with the Metalaxyl RED. Deficiencies are listed in the table below. Subject to final review by the Product Manager, PRB recommends that the registrant resubmit to the Product Manager revised product labeling that addresses the deficiencies specified in this review and any other deficiencies specified by the Product Manager.

Appendix I

PRB Label Analysis For Compliance With Label Revisions Specified In the RED/IRED and/or Technical Reviews

Label Requirement	Acceptable	Not Acceptable	Comments
Restricted Use Pesticide	N/A		
Ingredients Statement	X		
Signal Word	X		,
First Aid	X		No statements are required per the acute
			toxicity review. However, PRB has no
		,	objection to the First Aid statements
<u> </u>			currently on the label.
Emergency Information	X		
Note to Physician	N/A		2
Hazards to Humans and	X		No statements are required per the acute
Domestic Animals			toxicity review. PRB has no objection
	ľ		to the Hazards to Humans and Domestic
]			Animals statements currently on the
			label.
PPE	X		
Engineering Controls	X		
User Safety	X		
Requirements			
User Safety	X		· ·
Recommendations			
Environmental Hazards		X	Per the metalaxyl RED, the text below
] .			must be added to the Environmental
			Hazard text currently on the label:
			"This product contains metalaxyl that is
			known to leach through soil into
			groundwater under certain conditions as
			a result of agricultural use. Use of this
			product in areas where soils are
			permeable, particularly where the water
			table is shallow, may result in
	2714		groundwater contamination."
Physical and Chemical Hazards	N/A		
WPS text	N/A		
Non-WPS text	N/A		
Storage and Disposal	X		
Spray Drift Labeling	N/A		
General Precautions and	X		
Restrictions			
Application Instructions		X	Because the REI for Metalaxyl is 24
			hours, PRB strongly recommends that
<u> </u> -		r	the text "After seeds have been planted,
			do not enter or allow worker entry into
			treated areas during the restricted-entry

Label Requirement	Acceptable	Not Acceptable	Comments
			interval (REI) of 12 bours" be revised t
			read "do not enter or allow worker entr
			into treated areas during the restricted-
			entry interval (REI) of 24 hours."
Other Comments	N/A		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

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14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

October 9, 2007

MEMORANDUM:

Subject:

EPA Reg. No.: 264-1035/Prosper T200 Insecticide & Fungicide Seed Treatment

DP Barcode: 344819

Case No.: 0012

From:

Marianne Lewis, Biologist

Product Reregistration Branch

Special Review and Reregistration Division (7508C)

To:

Barbara Briscoe, CRM

Product Reregistration Branch

Special Review and Reregistration Division (7508C)

Applicant:

Bayer CropScience

P.O. Box 12014

2 T.W. Alexander Drive

Research Triangle Park, NC 27709

FORMULATION FROM EPA Reg. No. 264-1035 LABEL:

	<u>% by wt.</u>
Active Ingredient(s):	
Carboxin	3.870%
Clothianidin	11.050%
Metalaxyl	0.414%
Trifloxystrobin	0.552%
Inert Ingredient(s):	84.114%
Total	100.000%

BACKGROUND: In the 8 month response to the Carboxin RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 264-1035. The MRID's are as follows: 468539-02 (81-1), 468539-03 (81-2), 468539-04 (81-3), 468539-05 (81-4), 468539-06 (81-5), 468539-07 (81-6). The studies were conducted by Product Safety Labs and the test material was confirmed as EPA Reg. No. 264-1034. These studies were reviewed and found to be acceptable by TRB/RD on 8/16/06. On 10/31/07, TRB granted the registrants request to cite these studies to support the registration of the subject product. After reviewing the studies PRB/SRRD concurs with RD's findings.

RECOMMENDATIONS:

 The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. 264-1035.

The acute toxicity profile for EPA Reg. No. 264-1035 is currently:

Acute Oral	IV	Acceptable
Acute Dermal	ľV	Acceptable
Acute Inhalation	IV	Acceptable
Primary Eye	IV	Acceptable
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Acceptable

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 000264-01035

PROSPER T200 INSECTICIDE & FUNGICIDE

SEED TREATMENT

SIGNAL WORD:

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Wear long sleeved shirt, long pants, shoes and socks.

FIRST AID*:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

*Note to Label Reviewers – due to acute toxicity category of IV for all studies no first aid statements are required, however, if the registrant chooses to have them on the label that is acceptable as long as they conform to the above statements.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

DATE OUT: 25/OCT/07

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 344810 REG./FILE SYMBOL NO.: 264-1035

PRODUCT NAME: Prosper T200 Insecticide and Fungicide Seed Treatment

MRID NOS.: 468506-01, 468506-02, 468506-03

COMPANY NAME: Bayer CropScience ACTION CODE: 674

FROM:

Maria Rivera Piansay, Chemist

Product Chemistry Team PRB/SRRD (7508C)

TO:

Barbara Briscoe, CRM

Product Reregistration Branch

Special Review and Reregistration Division (7508C)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 0012, was issued in September, 2004 for the Technical Grade Active Ingredient (TGAI) Carboxin (5,6-dihydro-2-methyl-N-phenyl-1,4-oxathin-3-carboxamide. According to the RED, the generic data base supporting the reregistration of Carboxin have been reviewed and found to be substantially complete.

In the 8-month response to the Carboxin RED, Bayer CropScience submitted Confidential Statements of Formula (CSF), one basic and one alternate formulation, both dated 8/20/07; a product label (no pin-punch date); and product chemistry data in MRID numbers 468506-01, -02, and -03. The registrant is requesting FIFRA Section 4 reregistration of EPA Reg. No. 264-1035.

FINDINGS:

- EPA Reg. No. 264-1035 is an end-use product that contains the active ingredients Carboxin, Clothianidin, Trifloxystrobin, and Metalaxyl at label claim nominal concentrations of 3.87%, 11.05%, 0.552%, and 0.414%, respectively.
- 2. The CSFs for the basic and alternate formulations, dated 8/20/07, are acceptable as presented. The nominal concentrations of the active ingredients agree with that on the label, meeting PR Notice 91-2 (Accuracy of Stated Percentages for Ingredients Statement). The certified limits on the active and the inert ingredients are acceptable in accordance with 40 CFR 158.175(b)(2). All ingredients listed on the CSFs are cleared for use in pesticide formulations and have tolerance exemptions for all food uses.
- 3. The product chemistry data in the MRIDs listed above were previously submitted to the Registration Division (RD) in connection with the registration of the subject product. These MRIDs were reviewed and accepted by S. Mathur of the TRB/RD on 11/21/06 under DP Barcode number D330683. MRID number 468506-01 pertain to data on Product Identity and Composition, Beginning Materials, Formulation Process, Discussion of Impurities, Color, Physical State, Odor, Oxidation/Reduction Action, Flammability, pH, Viscosity, and Density. Enforcement Analytical Method is found in MRID number 468506-02, and Storage Stability and Corrosion Characteristics are found in MRID number 468506-03. PRB/SRRD concurs that the data are acceptable and satisfy the 40 CFR guideline requirements for 158.155 to 158.190, and may be used to support the reregistration of the subject product.

4. The active ingredient statement on the label is acceptable in accordance with PR Notice 91-2 and 40 CFR 158.155. There are no data present that would trigger the Physical and Chemical Hazards statements on the label. Storage and Disposal section is acceptable in accordance with 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The registrant has satisfied product chemistry data requirements for the reregistration of EPA Reg. No. 264-1035.

Regt 264-1035 Vol 2
Page is not included in this copy.
Pages 31 through 36 are not included in this copy.
The material not included contains the following type of information:
Identity of product inert ingredients.
Identity of product impurities.
Description of the product manufacturing process.
Description of quality control procedures.
Identity of the source of product ingredients.
Sales or other commercial/financial information.
A draft product label.
The product confidential statement of formula.
Information about a pending registration action.
FIFRA registration data.
The document is a duplicate of page(s)
The document is not responsive to the request.
Internal deliberative information.
Attorney-Client work product.
Claimed Confidential by submitter upon submission to the Agency.
The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.

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EXTRA)

PROSPER® T200 Insecticide and Fungicide Seed Treatment

PROSPER T200 contains the following amount of active ingredient per gallon:	
1.19 lb. clothianidin; 0.06 lb. trifloxystrobin; 0.42 lb. carboxin; 0.045 lb. metalaxyl.	
ACTIVE INGREDIENTS:	
Clothianidin: [(C(E)]-N-(2-chloro-5-thiazolyl)methyl]-N'-methyl-N"-nitroguanidine	11.05%
Trifloxystrobin	
Carboxin: 5,6-dihydro-2-methyl-N-phenyl-1,4-oxathiin-3-carboxamide	
Metalaxyl: N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester	0.414%
OTHER INGREDIENTS:	
	TOTAL 100.00%
EDA Down No. 204 4026	EDA E-4

EPA Reg. No. 264-1035

EPA Est

KEEP OUT OF REACH OF CHILDREN CAUTION

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577
For PRODUCT USE Information Call 1-866-99BAYER (1-866-992-2937)

FIRST AID

IF IN EYES:		Hold eye open and rinse slowly and gently with water for 15-20 minutes.					
	•	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.					
	٠	Call a poison control center or doctor for treatment advice.					
	In case of emergency call toll free the Bayer CropScience Emergency Response Telephone No. 1-800-334-7577. Have a product container or label with you when calling a polson control center or doctor, or going for treatment.						

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, neoprene rubber. If you want more options, follow the instructions for category C and E on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicators, and other handlers must wear:

- -long sieeved shirt and long pants,
- -socks plus shoes,
- -chemical resistant gloves, except when bagging or sewing bags of treated seeds,
- -chemical resistant aprons when mixing, loading, or participating in dip treatments.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENGINEERING CONTROLS

When handlers use closed systems designed by the manufacturer to enclose the pesticide to prevent it from contacting handlers or other people and the system is functioning properly and is used and maintained in accordance with the manufacturer's written operating instructions, the handlers need not wear the chemical-resistant apron. However, the chemical-resistant gloves must be immediately available for use in an emergency, such as a spill or equipment breakdown.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate by disposal of wastes. Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.

Endangered Species

This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult http://www.epa.gov/espp before each season's use of this product.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use by commercial treaters only. Not for use on agricultural establishments in hopper-box, slurry-box, or other seed treatment applications at, or immediately before, planting. Do not apply this product in a way that will contact workers or other persons. Only protected handlers may be in the area during application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal, or by cleaning of equipment.

PESTICIDE STORAGE

Storage at low temperatures is not recommended. Do not store above 95°F. Do not store in direct sunlight.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Contact Bayer CropScience or your chemical supplier for container return instructions. If container is not returned in accordance with instructions, triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LABELING OF TREATED SEED

Seed that has been treated with this product that is then packaged or bagged for future use must contain the following labeling on the outside of the seed package or bag:

- This seed has been treated with clothianidin, trifloxystrobin, carboxin, and metalaxyl.
- Dispose of seed packaging in accordance with local requirements.
- This bag contains seed treated with carboxin. This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species with out authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a Bulletin consult http://www.epa.gov/espp before each season's use of this product.
- Treated seed exposed on soil surface may be hazardous to birds. Cover or collect spilled seeds.
- When opening this bag or loading/pouring the treated seed, wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves.
- Treated Seed- Do Not Use for Food, Feed, or Oil Purposes.
- After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. Exception: Once the seeds are planted in soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no worker contact with the soil/media subsurface.
- Rapeseed greens and seed grown or harvested from PROSPER T200-treated seed must not be used for feed or human
 consumption. Rapeseed grown and harvested from PROSPER T200-treated seed is only for industrial uses and cannot be
 used for edible oil or any other human/feed consumption.

Areas planted with treated seed may be replanted immediately with canola, rapeseed and com. These areas may also be
replanted after 30 days with cereal grains, grasses, non-grass animal feeds, soybeans, and dried beans. Do not plant any
other crop in the treated area for at least four months after treated seeds are planted.

GENERAL INFORMATION

PROSPER T200 is a systemic insecticide and fungicide seed treatment for use on canola and rapeseed for control of certain insect pests and for control of seed rot, damping off, seedling blight and early season root rot caused by *Pythium, Rhizocfonia, Fusarium* and *Alternaria*. Also controls seedborne Blackleg. For protection of seeds and emerging seedlings only.

For use in commercially available equipment designed for seed treatment only. Not for use in hopper-box, slurry-box, or similar seed treatment applications used at planting. This product is to be used in liquid or slurry treaters. Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

All seed treated with this product must be conspicuously colored at the time of treatment. If this product contains no colorant, an appropriate colorant must be added to distinguish seed and to prevent subsequent inadvertent use as a food for man or a feed for animals. Regulations pertaining to coloration of treated seed enforced by 40 CFR 153.155 must be strictly adhered to when using this product.

DIRECTIONS FOR USE

Prior to and during application, PROSPER T200 must be thoroughly agitated to ensure uniform mixing.

Canola and Rapeseed: Apply 21.5 fl. oz. of PROSPER T200 to 100 lbs. of seed using commercial seed treatment equipment.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Bayer CropScience, no claims are made to guarantee germination of carry-over seed.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

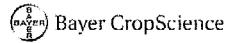
NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

NET CONTENTS:

PROSPER is a registered trademark of Bayer

PRODUCED FOR



Bayer CropScience LP P.O. Box 12014, 2 T.W. Alexander Drive Research Triangle Park, North Carolina 27709 1-866-99BAYER (1-866-992-2937)

PROSPER T200 (PENDING) SUBMITTED TO EPA 09/24/07

FILE SYMBOL

REGISTRATION NO.

CONFIDENTIAL STATEMENT OF FORMULA ENCLOSED

E E	F BASIC SUPPLIER					,	
SUB	APPLICANT					<u> </u>	
DATE	SUBMITTED						

Do Not Write Comments, Formula, or Parts of Formula on This Envelope

NOTE

it shall be unlawful—for any person to use for his own advantage or to reveal, other than to the Secretary, or officials or employees of the United States Department of Agriculture or other Federal agencies, or to the courts in response to a subpoena, or to physicians, and in emergencies to pharmacists and other qualified persons, for use in the preparation of antidotes, in accordance with such directions as the Secretary may prescribe, any Information relative to formulas of products acquired by authority of Section 4 of the "Federal insecticide, Fungicide, and Rodenticide Act."

PR FORM 9-11 (MARCH 2006)

31

USDA.ARS

Page is not included in this copy.
Pages 32 through 31 are not included in this copy.
The material not included contains the following type of information:
Identity of product inert ingredients.
Identity of product impurities.
Description of the product manufacturing process.
Description of quality control procedures.
Identity of the source of product ingredients.
Sales or other commercial/financial information.
A draft product label.
The product confidential statement of formula.
Information about a pending registration action.
FIFRA registration data.
The document is a duplicate of page(s)
The document is not responsive to the request.
Internal deliberative information.
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Claimed Confidential by submitter upon submission to the Agency.
The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request

PRODUCT REREGISTRATION SUPPORTING DOCUMENTATION

FOR

Case Name: CarboxIN

Reg. No. 264 - 1035

This supporting documentation (in chronological order) includes:

- o Old labels (identified as "Superceded by label dated xx/xx/xx")
- Unacceptable CSFs (marked "Not Acceptable" and dated)
- Product chemistry reviews
- Acute Toxicity reviews
- Efficácy reviews (if necessary)
- o 90-day responses to PDC1 (Form A and Form B)
 - Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
 - Correspondence

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. $264-1035$
Send to SIG: check box □
This material is:
New stamped-accepted label New CSF Notification Final Printed Label Other:
Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).
Reviewer's Name:
Phone: Division:
Date:

Leze read instructions on reverse before completing form.	Form A	pproved. OMB No.	2070-0060	D. Approvel expires 2-28-9
United States Environmental Protect Washington, DC 26	ion Agency	Registra Amenda Other	tion	OPP Identifier Number
Applicat	ion for Pesticide - Se	ction I		
1. Compeny/Product Number 264-1035	2. EPA Product Ma Venus E			pposed Clessification
4. Company/Product (Neme) Prosper T200 Insecticide and Fungicide Seed Tre	PM#			None Restricted
5. Name and Address of Applicant <i>IInclude ZIP Code)</i> Bayer CropScience PO Box 12014, 2 T.W. Alexander Drive Research Triangle Park, NC 27709 Check if this is a new address	(b)(i), my producto:	t is similar or ident	tical in cor	F(FRA Section 3(c)(3) mposition and labeling
	Section - II			
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional paga(s) if necessary. (For sections)	Agency 1s "Me Too" Other - Existence on I and Section II.)	ed lebels in repsons etter dated Application. cplain below.	e to	,
BCS' 8 month response to the 1/26/2007 Carboxin Product Speci	Section - III			· · · · · · · · · · · · · · · · · · ·
1. Material This Product Will Be Packaged In:	Occuon III			****
Child-Resistant Packaging Yes No * Certification must be submitted Unit Packaging Yes No Yes No No If "Yes" Unit Packaging wgt.	Water Soluble Peckaging Yes No If "Yes" Peckage wgt No. page contain		Conteiner Metel Plastic Gless Peper Dthar (S	pecify)
3. Location of Nat Contents Information 4. Size(s) R	eteil Container	5. Location of Lel	set Oirectio	ns
	ogreph Other plued	per		
	Section - IV			
t. Contact Point Complete items directly below for identification		d, if necessary, to p	ocess this	application.)
Neme Jamin Huang	Title Registration Produ	cl Manager		e No. (Include Arca Code) 919-549-2634
Certific I certify that the statements I have made on this form as I acknowledge that any knowlingly false or misleading s both under applicable law.	nd all ettechments thereto era tr			8. Dete Application Received (Stamped)
2. Signature Jan Fluer	3. Title Registration Produc	t Manager		
4. Typed Name Jamin Huang	5. Data September	24, 2007		40

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

L
Electronic file name
64-01035.PROSPERT200.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

MnabWilhirs Signature	09/24/2007
Signature	Date
Anna B. Wilkins	
Name (typed)	
Label Development Specialist	
Title	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of informati and 0.25 bours per response for reregistration and special review activities, including time for comments regarding burden estimate or any other aspect of this collection of informatioo, incl Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Averto this address.	reading the instruction uding suggestions for I	s and completing the necessary forms. Seed reducing the burden to: Director, Collection
Certification with Respect to C	Citation of Data	
Applicant's/Registrant's Name, Address, and Telephone Number Bayer CropScience, 2 T.W. Alexander Dr., P.O. Box 12014, RTP, NC 27709		EPA Registration Number/Fite Symbol 264-1035
Active Ingredient(s) and/or representative test compound(s) Clothianidin, Carboxin, Metalaxyl, Trifloxystrobin		Date September 24, 2007
General Use Pattem(s) (list all those claimed for this product using 40 CFR Part 158 Terrestrial, Food Crop)	Product Name Prosper T200 Seed Treatment
NOTE: If your product is a 100% repackaging of another purchased EPA-registers submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to
I am responding to a Date-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should
SECTION I: METHOD OF DATA SUPF	ORT (Check one m	ethod only)
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	✓ under the	the sefective method of support (or cite-all option selective method), and have included with this form a list of data requirements (the Data Matrix form must be
SECTION II: GENERAL	OFFER TO PAY	
(Required if using the cite-all method or whan using the cite-all option under the select	tive method to satisf	y one or more data requirements
I hereby offer and agree to pay compensation, to other persons, with regard to	the approval of this	application, to the extent required by FfFRA.
SECTION III: CERT	FICATION	
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Oeta-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingradients in this product; and (2) requirements in effect on the date of approval of this application if the application souguess.	addition, if the cite-a t (1) concern the pro is a type of data that	all option or cite-all option under the selective method is perties or effects of this product or an identical or would ba required to be submitted under the data
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	it I am the original data submitter or that I have obtained
I certify that for each study cited in support of this registration or reregistration submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e) offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c) amount and terms of compensation, if any, to be paid for the use of the study.	study in support of th I have notified in wri	is application; (c) all periods of eligibility for ting the company that submitted the study and have
I certify that in all instances where an offer of compensation is required, copaccordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be evidence to the Agency upon request, I understand that the Agency may Initiate action FIFRA.	e submitted to the A	gency upon request. Should I fail to produce such
i certify that the statements i have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso		
Signature Curang	Date	Typed or Printed Name and Title
(Jan Command	Sept. 24, 2007	Jamin Hunag, Registration Manager

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

48

Form Approved OMB No. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-01634



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DATA MATRIX

Date: September 24, 2007	er 24, 2007		EPA Reg. No./File Symbol: 264-1035	Page 1 of 2
Applicant's/Reg	Applicant's/Registrant's Name & Address	Bayer CropScience LP 2 T.W. Alexander Drive P.O. Box 12014 Research Triangle Park, NC 27709	Product(s): Prosper T200 Insecticide and Fungicide Seed Treatment	side Seed Treatment
Ingredient: Cark	boxin, CAS # 5234-68-4;	Ingredient: Carboxin, CAS # 5234-68-4; Metalaxyl, CAS # 57837-19-1; Clothianidin, CAS # 210B80-92-5; Trifloxystrobin, CAS # 141517-21-7	1880-92-5; Trifloxystrobin, CAS # t4t517-21-7	

t4t517-21-7	
obin, CAS #	
; Trifloxystro	
210B80-92-5	
nidin, CAS#	
-1; Clothiar	
CAS # 57837-19	
; Metalaxyl,	
CAS # 5234-68-4	
Carboxin, C,	
Ingredlent:	

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830 Series	Product Chemistry (Group A)	46850601 46850602	Bayer CropScience	OWN	
830 Series	Product Chemistry (Group B)	46850601 46850602	Bayer CropScience	OWN	
830.63 t7	One yr storage stability and corrosive characteristics	46850603	Bayer CropScience	OWN	
870.1100	Acute Oral Toxicity (Rat)	see note	Bayer CropScience	OWN	Supported by 46853902
870.1200	Acute Dermal Toxicity (Rat)	see note	Bayer CropScience	OWN	Supported by 46853903
870.1300	Acute Inhalation Toxicity (Rat)	see note	Bayer CropScience	OWN	Supported by 46853904
870.2400	Primary Eye Irritation (Rabbit)	see note	Bayer CropScience	OWN	Supported by 46853905
870.2500	Primary Dermal Irritation (Rabbit)	see note	Bayer CropScience	OWN	Supported by 46853906
870.2600	Dermal Sensitization	see note	Bayer CropScience	OWN	Supported by 46853907
	All remaining generic data for:				
1000					

Signature		an Rus P	Name and Title:
EPA Form 8750-35 (12-2003) Electronic Paper vers	003) Elec	thenic Paper versions available. Submit only Paper version.	

Agency Internal Use Copy

Sept. 24, 2007

Date:

Jamin Huang Registration Product Manager

Form Approved OMB No. 2070-0060; 2070-0057; 2070-0122; 2070-01634



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	DATA MATRIX		
Date: September 24, 2007		EPA Reg. No./File Symbol: 264-1035	Page 2 of 2
Applicant's/Registrant's Name & Address Bares 2.2.P. P.	Bayer CropScience LP 2 T.W. Alexander Drive P.O. Box t2014 Research Triangle Park, NC 27709	Product(s): Prosper T200 Insecticide and Fungicide Seed Treatment	ide Seed Treatment
Ingredient: Carboxin, CAS # 5234-68-4; Metal	Ingredient: Carboxin, CAS # 5234-68-4; Metalaxyl, CAS # 57837-19-1; Clothianidin, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-21-7	880-92-5 ; Trifloxystrobin, CAS # 141517-21-7	

Guideline Reference Number	Guideline Study Name	MRtD Number	Submitter	Sirter	Note
Cite-all	Ecological effects		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyl), Sumi-Take (for clothianidin)	FOR	Trifloxystrobin (owned by Bayer CropScience)
Cite-all	Toxicology		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyt), Sumi-Take (for clothianidin)	FOR	Triffoxystrobin (owned by Bayer CropScience)
Cite-all	Environmental Fate		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyt), Sumi-Take (for clothianidin)	FOR	Trifloxystrobin (owned by Bayer CronScience)
Cite-all	Residue chemistry		Chemtura (for carboxin), Nation's Ag LLC (for metalaxyl), Sumi-Take (for clothianidin)	FOR	Triffoxystrobin (owned by Bayer Crop Science)
					(appropriate)
•					

Submit only Paper version. EPA Form 8750-35 (12-2003) Electionic Paper versions available.

Signature

24, 2007

Sept.

Date:

Jamin Huang Registration Product Manager

Name and Title:

Agency Internal Use Copy

Form Approved OMB No. 2070-0060; 2070-0057; 2070-0122; 2070-01634



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities, holiding time for reading the instructions and completing the necessary forms. Send comments regarding the burden of entry other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX		
Date: September 24, 2007	EPA Reg. No JFIke Symbol: 264-1035	Page 1 of 2
Applicant's/Registrant's Name & Address Bayer CropScience LP 2 T.W. Alexander Drive P.O. Box 12014 Research Triangle Park, NC 27709	Product(s): Prosper T200 Insecticide and Fungloide Seed Treatment	dde Seed Treatment
ingredient Carboxin, CAS # 5234-68-4; Metalaxyl, CAS # 57837-19-1; Clothiankiln, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-21-7	80-92-5; Trifloxystrobin, CAS # 141517-21-7	

Guideline Beferense Mumber	Control of the Contro				
	cuidellile Study Name	MRID Number	Submitter	Status	Note
			Bayer CropScience	OWN	
			Bayer CropSclence	NWO	
			Bayer CropSclence	OWN	
			Bayer CropScience	OWN	
			Bayer CropSclence	OWN	
			Bayer CropSclence	OWN	
			Bayer CropScience	NMO	
			Bayer CropSclence	OWN	
	:		Bayer CropScience	OWN	
	All remaining generic data for:				

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EPA Form 8750-35 (12-2003) Electrofilic Pepelyvarsions evallable. Submit only/aper version.

Public Use Copy

Registration Product Manager

Jamin Huang

Name and Title:

Sept. 24, 2007

Date:

43

Form Approved OMB No. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-01634



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

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DATAMATRIX	
Date: September 24, 2007	EPA Reg. No./File Symbol: 264-1035 Page 2 of 2
Applicant's/Registrant's Neme & Address Bayer CropSclence LP 2 T.W. Alexander Drive P.O. Box 12014 Research Triangle Park, NC 27709	Product(e): Prosper T200 Insectkide and Fungicide Seed Treatment
Ingredient Carboxin, CAS # 5234-68-4; Metelaxyl, CAS # 57837-19-1; Clothianidin, CAS # 210880-92-5; Trifloxystrobin, CAS # 141517-21-7	0-92-5 ; Trifloxystrobin, CAS # 141517-21-7

Guideline Referance Number	Gukdeline Study Name	MRID Number	Submitter	Status	
Cite-all	Ecological effects				
Cite-all	Toxicology			FOR	
Clte-all	Environmental Fate			FOR	
Cite-all	Residue chemistry		L.	FOR	
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Skynature	- (luc-f		Name and Title: Jamin Huang Registration Product Manager	Date: Sept. 24, 2007	

EPA Form 9750-35 (12-2003) Electrolitic Paper versions available. Subjett only Paper version.

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Prosper T200 Insecticide and Fungicide Seed Treatment EPA Reg. No. 264-1035

Product-Specific Study Requirements (submitted 4/26/07)

OPPTS GLN No.	Study Description	Study Due Date	Bayer Response
Product	Chemistry Data Requirements		
830.1550	Product identity and composition	9/26/07	Option 6, MRID No. 46850601
830.1600	Description of materials used to produce the product	9/26/07	Option 6, MRID No. 46850601
830.1620	Description of production process	9/26/07	Option 8, not applicable to an EUP
830.1650	Description of formulation process	9/26/07	Option 6, MRID No. 46850601
830.1670	Discussion of formation of impurities	9/26/07	Option 6, MRID No. 46850601
830.1700	Preliminary analysis	9/26/07	Option 6, MRID No. 46850602
830.1750	Certified limits	9/26/07	Option 6, MRID No. 46850601
830.1800	Enforcement analytical method	9/26/07	Option 6, MRID No. 46850602
830.6302	Color	9/26/07	Option 6, MRID No. 46850601
830.6303	Physical state	9/26/07	Oplion 6, MRID No. 46850601
830.6304	Odor	9/26/07	Option 6, MRID No. 46850601
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	9/26/07	Option 8, not applicable to an EUP
830.6314	Oxidizing or reducing action	9/26/07	Option 6, MRID No. 46850601
830.6315	Flammability	9/26/07	Option 6, MRID No. 46850601
830.6316	Explodability	9/26/07	Oplion 6, MRID No. 46850601
830.6317	Storage stability of product	9/26/07	Option 6, MRID No. 46850603
830.6319	Miscibility	9/26/07	Option 6, MRID No. 46850601
830.6320	Corrosion characteristics	9/26/07	Option 6, MRID No. 46850603
830.6321	Dielectric breakdown voltage	9/26/07	Option 6, MRID No. 46850601
830.7000	pH of water solutions or suspensions	9/26/07	Option 6, MRID No. 46850601
830.7050	UV/visible absorption	9/26/07	Option 8, not applicable to an EUP
830.7100	Viscosity	9/26/07	Option 6, MRID No. 46850601
830.7200	Melting point/melting range	9/26/07	Option 8, not applicable to an EUP
830.7220	Boiling point/boiling range	9/26/07	Option 8, not applicable to an EUP
830.7300	Density/relative density	9/26/07	Option 6, MRID No. 46850601
830.7370	Dissociation constant in water	9/26/07	Option 8, not applicable to an EUP
830.7550	Partition coefficient (n-octanol/water), shake flask method	9/26/07	Option 8, not applicable to an EUP
830.7570	Partition coefficient (n-octanol/water),estimated by liquid chromatography	9/26/07	Option 8, not applicable to an EUP
830.7840	Water solubility: column elution method, shake flask method	9/26/07	Option 8, not applicable to an EUP

830.7860	Water solubility, generator column method	9/26/07	Option 8, not applicable to an EUP
830.7950	Vapor pressure	9/26/07	Option 8, not applicable to an EUP
Toxicol	ogy Data Requirements		
870.1 t00	Acute oral toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853902. Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1200	Acute dermal toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853903 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1300	Acute inhalation toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853904 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2400	Acute eye irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classitied as acceptable: MRID No. 46853905 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2500	Acute dermal irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853906 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2600	Skin sensitization	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853907 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)

Responding to Product Specific Study Requirements

Option 1. Developing data (conducting	a new study to be submitted within time allowed)
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- Option 2. Agreement to share in cost to develop data with one or more registrants
- Option 3. Offer to share in cost of data development with one or more registrants
- Option 4. Submitting an existing study that has never been submitted to EPA
- Option 5. Upgrading a study that EPA said could be upgraded
- Option 6. Citing an existing study that EPA has previously classified as acceptable
- Option 7. Request for waiver of data requirement because study is inappropriate for the product
- Option 8. The product meets the criteria for "not applicable" as expressed in the footnote for that specific Guideline requirement

Prosper T200 Insecticide and Fungicide Seed Treatment EPA Reg. No. 264-1035

Product-Specific Study Requirements (8 Month DCI Response, dated September 24, 2007)

- Application for Registration (EPA Form 8570-1) dated September 24, 2007
- Updated label dated September 24, 2007 (5 copies)
- Based on approved EPA label dated 12/14/2006
- Incorporated all of the requested revisions per the January 26, 2007 Carboxin Product Specific DCI Notice
- III. Updated CSFs (basic dated August 20, 2007, alternate dated August 30, 2007, 2 copies each)
- Based on <u>approved CSFs</u> (basic: CSF ID # 1035.B013, dated 1/30/07; alternate: CSF ID # 1035.A012, dated 1/31/07). A copy of each CSF is attached for your comparison.
- Added alternates to
- Updated CSFs (basic: CSF ID # 1035,B014, dated 8/20/07; alternate: CSF ID # 1035.A012, dated 8/30/07). Two copies of each CSF are attached.
- IV. Certification with Respect to Citation of Data (EPA Form 8570-34) dated September 24, 2007, and Data Matrix dated September 24, 2007
- V. No need for any new study reports

Bayer CropScience



September 24, 2007

Document Processing Desk (DCI/SRRD)
Office of Pesticide Programs (7508P)
U.S. Environmental Protection Agency
2777 S. Crystal Drive
One Potomac Yard (South Building)
Arlington, VA 22202

ATTENTION: Barbara Briscoe, Chemical Review Manager (DCI/SRRD)

Re: Carboxin

ID#: PDCI-090201-24633

8 Month Response to Product-Specific Data Call-In

Dear Ms. Briscoe,

Bayer CropScience is herein submitting our 8 month response to the Carboxin Product-Specific Data Call-In Notice received on January 26, 2007. As stated in our 90 day response, we would cancel voluntarily two products — 1) Gaucho CS Flowable (EPA Reg. No. 264-981) and 2) Cotgard (EPA Reg. No. 264-983), and transfer the registration of Gustafson Vitaflo 280 Flowable Fungicide (EPA Reg. No. 264-947) to Chemtura USA Corporation. This registration transfer was approved by the Agency on June 19, 2007, and its new EPA Reg. No. under Chemtura is 400-564.

The following documents are provided in support of the re-registration of the ten (10) Bayer CropScience's carboxin-containing products, as listed below:

EPA Reg. No. 264-1015 Prevail Stiletto Pak EPA Reg. No. 264-1016 EPA Reg. No. 264-1017 Imidacloprid-Vitavax-Metalaxyl EPA Reg. No. 264-1019 Stiletto EPA Reg. No. 264-1034 Prosper T400 Insecticide and Fungicide Seed Treatment. EPA Reg. No. 264-1035 Prosper T200 Insecticide and Fungicide Seed Treatment EPA Reg. No. 264-940 Vitavax-PCNB Flowable Fungicide EPA Reg. No. 264-943 RTU-Vitavax-Thiram Seed Treatment Fungicide EPA Reg. No. 264-949 Vitavax PC Peanut Seed Treatment Fungicide EPA Reg. No. 264-984 Titan FL

Bayer CropScience 2 T.W. Alexander Drive P. O. Box 12014 Research Triangle Park, NC 27709 Tel: 919 549-2000

- A summary sheet listing all of the documents enclosed for each of these 10 products, including
 - Application for Re-registration (EPA Form 8570-1).
 - Five (5) copies of updated labeling per the January 26, 2007 Carboxin Product Specific DCI. Also attach a copy of the updated label with all of the revisions highlighted in yellow in relation to its latest EPA approved label.
 - A CD containing an electronic file of the updated labeling. In addition, a certification with respect to label integrity dated September 24, 2007.
 - Two (2) copies of the Confidential Statement of Formula (CSF) for each of the updated basic and/or alternate formulations. Also attach a copy of the corresponding EPA approved CSFs.
 - Certification with Respect to Citation of Data (EPA Form 8570-34) and a Data Matrix for EPA Internal use and for Public use.
- 2. Three (3) copies of each of the required study reports. The submittal documents are in the summary sheet for 1) Stiletto (EPA Reg. No. 264-1019), 2) Imidacloprid-Vitavax-Metalaxyl (EPA Reg. No. 264-1017), 3) RTU-Vitavax-Thiram Seed Protectant Fungicide (EPA Reg. No. 264-943) and 4) Vitavax-PCNB Flowable Fungicide (EPA Reg. No. 264-940).

Please contact me at <u>jamin.huang@bayercropscience.com</u> or at 919-549-2634 if you have any questions regarding this 8 month DCI response.

Sincerely,

Jamin Huang, Ph.D.

Product Registration Manager

Attachments

Prosper T200 Insecticide and Fungicide Seed Treatment EPA Reg. No. 264-1035

Product-Specific Study Requirements

OPPTS GLN No.	Study Description	Study Due Date	Bayer Response
Product	Chemistry Data Requirements		
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830.1620	Description of production process	9/26/07	Option 8, not applicable to an EUP
830.1650	Description of formulation process	9/26/07	Option 6, MRID No. 46850601
830.1670	Discussion of formation of impurities	9/26/07	Option 6, MRID No. 46850601
830.1700	Preliminary analysis	9/26/07	Option 6, MRID No. 46850602
830.1750	Certified limits	9/26/07	Option 6, MRID No. 46850601
830.1800	Enforcement analytical method	9/26/07	Option 6, MRID No. 46850602
830.6302	Color	9/26/07	Option 6, MRID No. 46850601
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830.6304	Odar	9/26/07	Option 6, MRID No. 46850601
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	9/26/07	Option 8, not applicable to an EUP
830.6314	Oxidizing or reducing action	9/26/07	Option 6, MRID No. 46850601
830.6315	Flammability	9/26/07	Option 6, MRID No. 46850601
830.6316	Explodability	9/26/07	Option 6, MRID No. 4685060 t
830.6317	Storage stability of product	9/26/07	Option 6, MRID No. 46850603
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830.7050	UV/visible absorption	9/26/07	Option 8, not applicable to an EUP
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830.7200	Melting point/melting range	9/26/07	Option 8, not applicable to an EUP
830.7220	Boiling point/boiling range	9/26/07	Option 8, not applicable to an EUP
830.7300	Density/relative density	9/26/07	Option 6, MRID No. 4685060 t
830.7370	Dissociation constant in water	9/26/07	Option 8, not applicable to an EUP
830.7550	Partition coefficient (n-octanol/water), shake flask method	9/26/07	Option 8, not applicable to an EUP
830.7570	Partition coefficient (n-octanol/water),estimated by liquid chromatography	9/26/07	Option 8, not applicable to an EUP
830.7840	Water solubility: column elution method, shake flask method	9/26/07	Option 8, not applicable to an EUP

830.7860	Water solubility, generator column method	9/26/07	Option 8, not applicable to an EUP
830.7950	Vapor pressure	9/26/07	Option 8, not applicable to an EUP
Toxicol	ogy Data Requirements	***	
870.1100	Acute oral toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853902. Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1200	Acute dermal toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRtD No. 46853903 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.1300	Acute inhalation toxicity	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853904 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2400	Acute eye irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853905 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-t035)
870.2500	Acute dermal irritation	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853906 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)
870.2600	Skin sensitization	9/26/07	Option 6, Citing an existing study that EPA has previously classified as acceptable: MRID No. 46853907 Note: this study conducted with Prosper T400 (EPA Reg No. 264-1034) and used to bridge to Prosper T200 (EPA Reg No. 264-1035)

Responding to Product Specific Study Requirements

- **Option 1.** Developing data (conducting a new study to be submitted within time allowed)
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	United Age	United States Environmental Protection Agency Washington, D.C. 20460	l Protectio			OMB Approval 2070-0107 OMB Approval 2070-0057	070-0107
	REQUIREMENTS STATUS	STATUS AND REGISTRANT'S RESPONSE	I'RANT'S	RESPONSE	٠		
INSTRUCTIONS: Please type or pri Use additional sheet(s) if necessary.	INSTRUCTIONS: Please type or print in Ink. Please read carefully the attached instructions and supply the informetion requested on this form. Use additional sheat(e) if necessary.	ne attached instructions and si	upply the Info	metion requested on this fo	É		
1. Company Name and Address	92	2. Cause # and Name	!		3. Date and Type of DCI and Number	mber	
BAYER CROPSCIENCE LP	L'P	0012 Carboxin			23-Jan-2007		
Z I.W. ALEXANDEH DRIVE RESEARCH TRIANGLE PARK, NC	10'E. PARK, NC 27709	EPA Reg. No. 264-1035	₽.		PRODUCT SPECIFIC ID # PDCI:090201-24633		
4. Guideline yurementamber	5. Study Title		Progress T Progress O Reports	8. Use Pettern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1 2	T es			
O CONTRACTOR	Product Chemistry Data Requirements (Conventio Chemical)	<u>nal</u>		in the second se		12	
	Product Identity and composition	(38)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	T@AI/MP/EP	80	9
830.1600	Description of materials used to produce the product	(L)		A, B, O, D, E, F, G, H, I) J, K, L, M, N, O	TGAI/MP/EP	œ.	9
	Description of production process	(18)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O		80	06
830/1650 II	Description of formulation process	(16) (7)		A, B, G; D, E, F, G, H, I) J, K, L, M, N, O	MP/EP	8	9
630.1670 Di	Discussion of formation of impurities			A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	9
19 0071	Preliminary analysis	(86,37,38)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	IIGAI	8	. 9
	Certified limits	(11,01)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	_	9
830:1800	Enforcement analylical method	(23)		A,B,C,D,E,F,G,H,I) J,K,L,M,N,O	TGAI/MP/EP	8,77 Jeff of the second	\ 0
	Color	(12)	5 5	A B, C, D, E, F, G, H, I, J, K, L, M, N, O		8	9
830.6303	Physical State	(32)		A,B,C,D,E,F,G,H,IF J,K,L,M,N,O	IGAI/MP/EP	9	٩
830.8304 🗘	Odor	(82)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	T@ALMP/EP	8	9
 Certification I certify that the statements made on this knowingly false or misleading statement may be purishable to Signature and Title of Company's Authorized Representative. 	10. Certification I certify that the statuments made on this form and all attachments ere true, knowingly take or misleading statement may be purishable by line, imprisorment a join units Stansture and Title of Company's Authorized Representative.	all attachments ere true, prisoemet La jorth and s	e, accurate, and col	Lapplicable lang complete. I acknowledge that any	2 11. Date 413/07	Lol	
12. Name of Company	Bayer CropSienc	Sience		!	13. Phone Number	2-625-616	2634

	United States E Agency War	United States Environmental Protection Agency Washington, D.C. 20460	Protection 20460	l TOPODO		OMB Approval 2070-0107 OMB Approval 2070-0657	770-0107 770-0057
INSTRUCTIONS: Please type or print in Ink. Use additional sheet(s) if necessary.	or print in Ink. Please read cerretully ti		pply the Inform	nation requested on this form			
1. Company Name and Address	88	2. Case # and Name		· ·	. Date and Type of DCI and Number	nber	
BAYER CROPSCIENCE LP	ELP Save	0012 Carboxin			23-Jan-2007		
RESEARCH TRIANGLE PARK, NC	PARK, NC 27709	EPA Reg. No. 264-1035	ις		PHODUCT SPECIFIC ID # PDCI-090201-24633		
4. Guideline yulrement mber	6. Study Title	220700	P Progress O Reports O Reports C C	8. Use Pattern	7. Test Substance	8. Time 9 Frame F	9. Registrant Response
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# 10 mm	Oxidizing or reducing action	(30)			MP/EP	6	9
830.6315 F52	Flammability	(25)		, 5, 5,	МР/БР	9	•
	Explodability	,			MP/EP	σ.	9
830.6317	Storage stability of product	(44)		A,B,C,D,E,E,G,H,I, J,K,L,M,N,O	MP/EP	8	` ^
	Miscibility				MP/EP		9
(6320)	Corrosion characteristics	((3))		A, B, C, D, E, E, G, H; I, J, K, L, M, N, O	MP/EP	8	9.
v	Dielectric broakdown voltage	(18)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	σ	9
930,7000	pki of water solutions or suspensions	, j.T.T. (33:34) × 1		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	. 9
830.70 6 0	UV/Visibie absorption			A, B, C, D, E, F, G, H, 1, J, K, L, M, N, O	TGAI/PAI	8	۵
830,7100	Viscosity	$\frac{1}{2}\sum_{i=1}^{n}(1-i)^{n}\left(\frac{dT_{i}}{dT_{i}}\right) \leq \frac{1}{2}\sum_{i=1}^{n}(\frac{dT_{i}}{dT_{i}}\right)$		A.B.C.D E.F.G.H.II J.K.L.M.N.O	MP/EP	8 7-25 Test of 18	9
830.7200 M	Metting point/melting range	(28, 23)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	ω	00
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	Unite	United States Environmental Protection Agency Washington, D.C. 20460	Protectio	П		OMB Approval 2070-0107 OMB Approval 2070-0057	2070-0107
	REQUIREMENTS STATUS A	STATUS AND REGIST	RANT'S	ND REGISTRANT'S RESPONSE			
INSTRUCTIONS: Please type or pri Use additional sheet(s) if necessary.	INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.	he attached instructions and su	poly the Infor	maticn requested on this fo	m,		
t. Company Name and Address	889	2 Case # and Name			3. Date and Type of DCI and Number	mber -	
BAYER CROPSCIENCE LP	ж. ሁ	. 0012 Carboxin			23-Jan-2007		•
2 T.W. ALEXANDER DRIVE RESEARCH TRIANGLE PARK, NC	DRIVE E PARK, NC 27709	EPA Reg. No. 264-1035	10		PRODUCT SPECIFIC ID # PDCI-090201-24633	~	
4. Guideline ' jurement , mber	5. Study Title		Progresses Reports	6. Use Pettern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
		001	1 2		,		
830,7220	Bolling point/bolling range	(6:49)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	III TIGALI	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	O o
	Density/relative density	(14,15)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAL/MP/EP	82	9
880077370 27 E	Dissociation constant in water.	(2) 2015 F		A, B, C, D, E, F, CO HAIL J, K, L, M, N, O, L, L, TS	31, TOAL OND A PRINT.	9	Ф
-	Partition coefficient (n-octanol/weter), shake flask method	nake flask (32)			, I, TGAI/PAI	æ	
830,7570	Partition coefficient (n-octanol/water), estimation by (include chromatography	stimation by (31)		A.B. C. D. E.F. G. H. I. J. K. L. M. N. O	TGAI/PAI	8	Ą
830.7840	Water solubility: Column elution method, shake flask method	hake flask (49)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	œ	ኤ
7,7860	Water solubility, generator column method	iod (48)		A7B. C, D, E, F, G, H, 1, J, K, L, Mi N, O	TGAI or PAI	8	A,
830.7950	Vapor рг ос виле	(45,46)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	σ.	90
	Toxicology Data Requirements (Conventional Chen	rentional Chemical)					
•	Acute Oral Toxicity	E		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI, EP, dilute EP?	8	9
870:(200	Acute demal toxicity	(4) (4) (5)		A, B, C, D, E, E, G, H, I, J, K, L, M, N, O	TGAI,EP,diluté EP?	8	\ 0
870.1300,	Acute Inhelation toxicity	(9)		A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	ω	P
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	Unite	United States Environmental Protection	Protection 20460			OMB Approval 2070-0107 OMB Approval 2070-0057	2070-0107
	REQUIREMENTS STATUS	STATUS AND REGISTRANT'S RESPONSE	RANT'S RI	ESPONSE			_
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1. Company Name and Address	889	2. Case # and Name		හ්	Date and Type of DCI and Number	per	72
BAYER CROPSCIENCE LP 2 T.W. ALEXANDER DRIVE	JE LP	0012 Carboxin			23-Jan-2007 PRODITET SPECIFIC		
RESEARCH TRIANGLE PAHK, NC	E PAHK, NC 27709	EPA Reg. No. 284-1035	Ω		ID # PDCI-090201-24633		
4. Guideline juirement rnber	5. Study Title		P Progresss O Reports	6. Use Pettem	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1 2 3				
	Acute eye initiation a figure of Acute demei initiation	(2000円) (2000円) (2000円)		A, B, C, D, E, F, G, H II J, K, E, M, N, O A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAL&EP		9'
0.0000000000000000000000000000000000000	Skin serisitzation	(40%)			TGAl & EP	G	
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